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Attorneys for Defendant
ECOLAB INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ROBERT BANKWITZ, an individual;
WILLIAM JACOBO, an individual; and
JOSHUA HERNANDEZ, an individual;

Plaintiffs,

v.

ECOLAB INC., a Delaware corporation; and
DOES 1 through 100, inclusive,

Defendants.

Case No. 3:17-cv-02924-EMC

Assigned to: Hon. Edward M. Chen

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEFENDANT'S
TIME TO RESPOND TO MOTIONS TO
CONFIRM ARBITRATION AWARDS
AND PLAINTIFFS' TIME TO REPLY**

Pursuant to Local Rule 6-1(b), Defendant Ecolab Inc. (“Defendant”) and Plaintiffs Robert Bankwitz and William Jacobo (“Plaintiffs”), by and through their respective counsel, enter into the following stipulation:

WHEREAS, on March 11, 2020, Plaintiff Robert Bankwitz filed an Application to Confirm Arbitration Award (“Bankwitz Application”) (Dkt. No. 93);

WHEREAS, on March 23, 2020, Plaintiff William Jacobo also filed an Application to Confirm Arbitration Award (“Jacobco Application”) (Dkt. No. 95);

WHEREAS Defendant’s response to the Bankwitz Application is due March 25, 2020, with any reply thereto due on April 1, 2020;

WHEREAS Defendant’s response to the Jacobco Application is due April 6, 2020, with any reply thereto due on April 13, 2020;

WHEREAS the Court has continued the next case management conference in these matters until June 18, 2020 (Dkt. No. 96); and

WHEREAS the disruptions caused by the COVID-19 virus and the efficiency of responding to both Applications in a single filing make it preferable for Defendant to respond to both Applications on April 8, 2020, with any replies thereto due on April 15, 2020.

NOW, THEREFORE, the Parties hereby respectfully request that

1. The deadline for Defendant’s responses to the Bankwitz and Jacobco Applications be extended until April 8, 2020; and

2. The deadline for Plaintiffs’ replies in support of the Bankwitz and Jacobco Applications be extended until April 15, 2020.

Dated: March 25, 2020

JONES DAY

/s/ Kelsey Israel-Trummel

Kelsey Israel-Trummel

Attorneys for Defendant
ECOLAB INC.

1 Dated: March 25, 2020

HATHAWAY, PERRETT, WEBSTER,
POWERS, CHRISMAN & GUTIERREZ

2
3 /s/ Alejandro P. Gutierrez

Alejandro P. Gutierrez

4 Attorneys for Plaintiffs
5 ROBERT BANKWITZ AND WILLIAM
JACOBO

6
7 **SIGNATURE ATTESTATION**

8 I hereby attest that concurrence in the filing of this document has been obtained from all
9 persons whose signatures are indicated by a “conformed” signature (/S/) within this efiled document.

10 Dated: March 25, 2020

By: /s/ Kelsey Israel-Trummel

Kelsey Israel-Trummel

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13 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

14 Dated: _____

15 Hon. Edward M. Chen
United States District Court Judge